

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547 (MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

**MICHAEL RUSSIN, RUSSIN
FINANCIAL, RUSSIN GROUP, SIMON
ARIAS, III, ARIAS AGENCIES, S.A.
ARIAS HOLDINGS, LLC, AMERICAN
INCOME LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

MOTION TO WITHDRAW APPEARANCE OF RACHEL E. LUTZ

AND NOW, comes the undersigned and hereby files the following Motion to Withdraw Appearance of Rachel E. Lutz and in support thereof avers as follows.

1. Defendant American Income Life Insurance Company was originally represented in the instant matter by Andrea M. Kirshenbaum, Esquire and Post & Schell, P.C. Ms. Kirshenbaum entered her appearance on June 13, 2022.

2. Rachel E. Lutz, Esquire was employed by Post & Schell, P.C. and entered her appearance in this matter on July 12, 2022.

3. On January 26, 2023, Ms. Kirshenbaum left Post & Schell, P.C. and joined the law firm Littler Mendelsohn, P.C., located at 1601 Cherry Street, Suite 1400, Philadelphia, PA 19102. She continues to represent Defendant American Income Life Insurance Company in this matter.

4. Ms. Lutz resigned her employment with Post & Schell, P.C. effective January 31, 2023.

5. As Defendant American Income Life Insurance Company continues to be represented by Ms. Kirshenbaum at her new firm, the undersigned respectfully requests that the Court withdraw the appearance of Rachel E. Lutz, Esquire in the above-captioned matter.

WHEREFORE, the undersigned respectfully requests that this Honorable Court enter the Order attached hereto.

Respectfully submitted,

/s/ Rachel E. Lutz
RACHEL E. LUTZ
PA No.: 315462

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ORDER OF COURT

AND NOW, this _____ day of _____, 2023, upon due consideration
of the Motion to Withdraw Appearance of Rachel E. Lutz, said Motion is hereby GRANTED and
the appearance of Rachel E. Lutz, Esquire is withdrawn as counsel of record for Defendant,
American Income Life Insurance Company.

BY THE COURT,

,J.